

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF THEIR  
SUPPLEMENTAL BRIEF IN SUPPORT  
OF MOTION TO STRIKE VAGUE AND  
OVERBROAD TRADE SECRET CLAIMS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and  
7 Ottomotto, LLC’s Administrative Motion to File Under Seal Portions of Their Supplemental Brief in  
8 Support of Motion to Strike Vague and Overbroad Trade Secret Claims (the “Administrative  
9 Motion”). The Administrative Motion seeks an order sealing highlighted portions of Uber’s  
10 Supplemental Brief in Support of Motion to Strike Vague and Overbroad Trade Secret Claims  
11 (“Uber’s Supplemental Brief”) and Exhibit 2 thereto, as well as the entirety of Exhibit 1 thereto.

12 3. The portions of Uber’s Supplemental Brief marked in red boxes, the entirety of Exhibit  
13 1, and the green highlighted portions of Exhibit 2 contain or refer to trade secret information, which  
14 Waymo seeks to seal.

15 4. Uber’s Supplemental Brief (portions marked in red boxes in version filed herewith),  
16 Exhibit 1 (entire document), and Exhibit 2 (green highlighted portions) contain, reference, and/or  
17 describe Waymo’s asserted trade secrets or information that, from context, tends to disclose Waymo’s  
18 asserted secrets. The information Waymo seeks to seal includes the confidential design and  
19 functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR designs,  
20 which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by  
21 Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The  
22 public disclosure of this information would give Waymo’s competitors access to descriptions of the  
23 functionality or features of Waymo’s autonomous vehicle system. If such information were made  
24 public, I understand that Waymo’s competitive standing would be significantly harmed.

25 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit 1 that merit  
26 sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on September 1, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7  
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

11  
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven